

Mr G Speller
Havant Borough Council
Public Service Plaza
PO9 2AX



27/06/2022

OBJECTION - Application Number: APP/22/00471 (Verge opp 65 St Johns Avenue PO7 5QZ)

Dear Mr Speller

This mast proposal is only 11 m from the closest residents in St Johns Avenue

The site is densely populated and the proposed antenna will be obtrusive and cause harm to the amenity of the area.

This infrastructure devalues nearby properties.

Its height would be an eyesore and overbearing to residents.

Most importantly, I am concerned that the Council is vulnerable to liability costs both from future claims from residents suffering harmful effects of wireless radiation and from Judicial Review proceedings.

1. **Costs of £13k were recently awarded against Brighton and Hove City council when they failed to address the health impacts of a proposed mast and to obtain adequate evidence of the assessment of the proximity of the mast to the school and the amended proposal. (Consent order 4.11/2021).**
2. **Residents living in close proximity to a mast became sick soon after the switch-on of a 5G mast in Pittsfield MA.** (<https://ehtrust.org/pittsfield-ma-board-of-health-unanimously-votes-to-issue-cease-and-desist-for-verizon-cell-tower/>)

The local council has served a 'Cease and Desist' notice on the Telecoms company Verizon,

"So on some level for me, win or lose this long battle with a company that's going to look at this on a global scale, at some point, I'm going to have to sit back 20 years later and say, did I do everything I could to safeguard the residents in Pittsfield when I was in that position or did I not? I guess that's the way I have to think about it."

It is vital that a rational, evidence-based determination of the safety of application APP/22/00471 is made.

The totality of the evidence supplied with this objection more than reaches a threshold of evidence to reasonably conclude that this mast is too close to residents and is an "unacceptable and incompatible" use of the land. The immediate and long term polluting effects to humans and the environment are extensive, so Policy 185 can be given significant weight. The negative impacts clearly outweigh any benefits, especially when increased connectivity can be achieved by fibre which is a safe alternative.

The obligations to protect the public health under the EEC European Electronics Communication Code transposed into UK Law in December 2020, and under the NHS Act 2006 need to be fulfilled jointly by central government and local authorities combined.³

Under the EEC recent science needs to be accounted for and precaution applied.

Confirmation that Local Planning Authorities are required to decide what weight to put on the ICNIRP guidelines and what weight to put on evidence submitted with objections was confirmed by Public Health England solicitors DLA Piper in August 2019.²

Despite NPPF 118 being specifically worded, no single policy can be treated as statute (Wright¹).

The references provided reveal the peril of relying on this policy to protect the public.

Please include the following in your determination:-

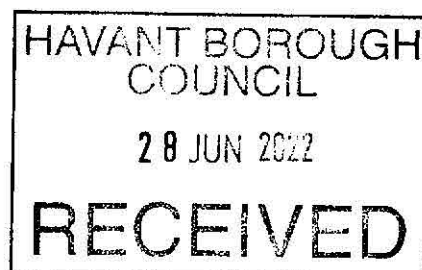
- **The science fully justifies a 500m setback distance from a mast** (both from epidemiological and lab studies). This 500m setback is ten times further than the estimated exclusion zone recommended by ICNIRP, the details of which have not been provided with this application. An even further setback distance is required to protect those suffering from electrohypersensitivity (EHS).
- **Schools are consulted during the planning application process, but children are equally vulnerable in their homes** as are pregnant women and pre-school children. It is important to honour the 500m setback distance to protect pregnant women and pre-school children.
- **Those with pacemakers, metal shunts, children with dental braces etc are not protected by the ICNIRP guidelines.** ICNIRP admit that the action of RFR inside the body is unpredictable when metal implants are present.
- **Nerve stimulation by the low frequency wave component of 5G has not been accounted for in the ICNIRP guidelines.**
- There is an established mechanism of harm from wireless radiation, namely oxidative stress.
- **There is substantial direct evidence of population-wide insect decline related to the installation of 4G and 5G infrastructure, and 72/83 lab studies show adverse effects of RFR on insects.** There are no environmental protections set by ICNIRP.
- **A 5G mast consumes 3-4 times the energy of a 4G mast.** This proposal is inconsistent with the Council's commitment to climate change. Please consider the whole lifecycle of manufacture from mineral extraction to disposal, the energy required for back-haul and the exponential increase in devices and Jevons paradox.

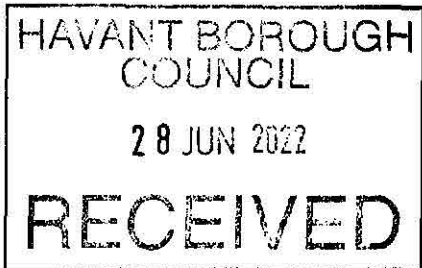
If there is an issue of competency for evaluating the totality of this evidence, particularly the science that underpins the necessity of a 500m setback distance from the mast to protect the general public, then please delay the application until relevant reports addressing this science are secured.

The reports could be requested from central government, and/or via submitting this evidence to the applicant via an International Standards Organisation Non-Compliance report with the included evidence.

Thank you for considering all the evidence in full and being mindful to refuse this application.

Signed ,





RELEVANT EVIDENCE

HEALTH

1) 500m SETBACK

The New Hampshire Commission requires wireless telecommunication antennas to be placed at least 1,640 feet (500m) from residents, parks, playgrounds, hospitals, nursing homes, day care centres and schools.

The 13-strong expert commission was formed through legislation to include experts in: physics, toxicology, electro-magnetics, epidemiology, biostatistics, occupational health medicine, public health policy, business and law. This recommendation is evidence based, and such evidence is globally applicable. *Transcript pertinent to the 500m setback Dr Kent Chamberlain: November 2021*
<https://www.youtube.com/watch?v=DWK74ie7krc>

2) *Lopez et al - What is the radiation prior to 5G?* March 2021. A correlation study between measurements in situ and in real time and epidemiological indicators in Vallecas, Madrid. The study reports dizziness, headaches and sleep disturbances.
<https://pubmed.ncbi.nlm.nih.gov/33434609/>

3) *Limiting liability with positioning to minimize the negative health effects of cellular phone towers*
This JD PEARCE paper states "There is a large and growing body of evidence that human exposure to RFR from cellular phone base stations causes negative health effects, including both i) neuropsychiatric complaints such as headache, concentration difficulties, memory changes, dizziness, tremors, depressive symptoms, fatigue and sleep disturbance, and ii) increased incidence of cancer in those living in proximity to a cell-phone transmitter station."
https://www.researchgate.net/publication/337624982_Limiting_liability_with_positioning_to_minimize_negative_health_effects_of_cellular_phone_towers

4) *Mobile phone mast health effects: J. Moskovic* March 2021
<https://www.saferemr.com/2015/04/cell-tower-health-effects.html>

5) *First Study so Far: 5G Causes the Microwave Syndrome: Lennart Hardell et al, Swedish Radiation Protection Foundation, 22 Feb. 2022 – automatic translation, as posted on 'Towards Better Health' by Meris Michaels.*
<https://ehtrust.org/study-5g-causes-microwave-syndrome/>
<https://mieuxprevenir.blogspot.com/2022/02/first-study-so-far-5g-causes-microwave.html?fbclid=IwAR2jNAFoHPsdCkACfShSDP5EBG4-eD6-QXf4gZOP08ObDLI2V308AFDsJ0s#more>

6) 2020 NIR Consensus Statement: UK initiative, health effects from RFR – signed by over 3500 medical and scientific experts.
<https://phiremedical.org/2020-nir-consensus-statement-read/>

ENVIRONMENT

INSECTS

1) *Thill - Biological effects of electromagnetic fields on insects – March 2020*
The review found that despite low levels of exposure to transmitters, harmful effects occurred after several months. Field strengths 100 times below the ICNIRP limits could already have effects. Against the background of the rapid decline of insects and the further expansion of high-frequency electromagnetic field sources, there is an urgent need for further research.
https://ehtrust.org/wp-content/uploads/Thill_Review_Insects_2020_Engl.pdf

2) *Diana Kordas - 5G Cell Towers Cause Massive Insect Decline on the Greek island of Samos*
February 22 2022

3) Electromagnetic radiation as an emerging driver factor for the decline of insects - Balmori 2021
<https://www.sciencedirect.com/science/article/abs/pii/S0048969720384461>

The biodiversity of insects is threatened worldwide. Numerous studies have reported the serious decline in insects that has occurred in recent decades. The same is happening with the important group of pollinators, with an essential utility for pollination of crops. The extent that anthropogenic electromagnetic radiation represents a significant threat to insect pollinators is unresolved and plausible. For these reasons and taking into account the benefits they provide to nature and humankind the precautionary principle should be applied before any new deployment (such as 5G) is considered.

CARBON FOOTPRINT & ENERGY IMPACTS

1) 5G and wireless telecommunications have an extremely large carbon footprint: internet traffic is set to triple over the next five years.

<https://www.cisco.com/c/en/us/solutions/executive-perspectives/annual-internet-report/index.html>

2) 5G base stations require three times more power than 4G base stations, equivalent to the needs of 73 typical homes.

<https://spectrum.ieee.org/5gs-waveform-is-a-battery-vampire>

<https://www.gsma.com/futurenetworks/wiki/5g-era-mobile-network-cost-evolution/>

3) Combined needs of base stations, data centres and devices are predicted by Huawei analyst Dr Anders Andrae to cause the telecommunications industry to consume over 20% of the world's electricity by 2025. https://www.researchgate.net/publication/320225452_Total_Consumer_Power_Consumption_Forecast

4) This compares with the global aviation industry which produces 2.5% of the world's greenhouse gas emissions: it is possible that 5G could create almost ten times that by 2030. (5, 6)

<https://ourworldindata.org/co2-emissions-from-aviation>

<https://www.mdpi.com/2078-1547/6/1/117/htm>

FOOTNOTES

1) The Supreme Court ruling in **R (Wright) v Resilient Energy Severndale Ltd.** and Forest of Dean Council [2019] UKSC 53 establishes that Government policy statements cannot 'undermine' what the settled case law has determined the term 'material consideration' means in the planning statutes (paragraph 45).

Lord Gill states in paragraphs 74 and 75,

"The guidance given by the Framework (NPPF) is not to be interpreted as if it were a statute. A policy statement cannot redefine the concept of a 'material consideration', which is a legal question that has an answer 'consistent over time'.

2) DLA PIPER – PHE solicitors letter, August 2019

"Guidance is not maintained and revised by PHE for the explicit purpose of any body undertaking any other statutory function. If in any other context regard is had to the Guidance that is entirely a matter for the discretion of the relevant body and it must determine what weight to place on the Guidance given the clear indication as to the sources from which the advice and recommendations in the Guidance are derived. Equally, that body must determine what other evidence from ... members of the public or interested parties to consider in making any decision". Full letter available on request.

3) Mendip Planning Authority recently confirmed (Dec 2021) that:

"LPAs are not the only competent authorities affected by the EECC. The requirements of the EECC are also exercised by the national government and other bodies. Recital 21 requires a set of "harmonised set of objectives and principles to underpin their work".

"In so far as LPAs are 'competent authorities' responsible for giving effect to the EECC in the exercise of their regulatory functions in respect of town and country planning, they are required to do so."